

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION**

In re:)	Chapter 9
)	
)	Case No. 13-53846
CITY of DETROIT, MICHIGAN)	
)	Hon. Steven W. Rhodes
)	
Debtor.)	

EX PARTE MOTION TO PERMIT TRADITIONAL PAPER FILINGS

NOW COMES The Lobb Law Firm, and for its Ex Parte Motion to Permit Traditional Paper Filings, states as follows:

1. On August 29, 2014, the Debtor filed its Fifth and Sixth Omnibus Objections to the Certain Claims (Docket Nos. 7197 and 7198).

2. Included in these objections were the following clients of The Lobb Law Firm who have judgments or pending claims against the Debtor:

- a. Carlita Buffington (Claim No. 3582).
- b. Melyni Richardson (Claim No. 3586).
- c. Bridgett Scott (Claim No. 3587).
- d. Gina Parker (Claim No. 3581).
- e. Clear Imaging & Michigan Spine & Rehab (Claim No. 3580).
- f. Clear Imaging, Michigan Spine & Rehab, Universal Health Group (Claim No. 3585).

3. Debtor's Objections require the filing of responses on behalf of the aforementioned clients in order to preserve their claims.

FILED
2014 SEP 29 P 4:00
U.S. DISTRICT COURT
E.D. MICHIGAN
DETROIT

4. Rule 5005-4 of United States Bankruptcy Court for the Eastern District of Michigan's Local Rules states: "All papers shall be filed using the ECF Procedures. Traditional Filings may be authorized as provided in those procedures."

5. ECF Rules require that attorneys admitted to practice in the United States District Court for the Eastern District of Michigan register as "filers" in the ECF system and receive ECF training from the court before papers may be filed in accordance with ECF procedures. ECF Procedure 4.

6. ECF Procedure 3(a) further provides that this Court will only accept papers filed using ECF procedures, unless upon a motion showing good cause this Court enters an order authorizing a traditional filing of a particular paper.

7. Procedure 3(b) further delineates which papers shall be filed by a traditional paper filing. Subsection (b)(6) provides that "other papers" may be filed on a limited basis if permitted by the judge upon a motion showing good cause.

8. The Lobb Law Firm is a personal injury firm that primary handles automobile accident cases arising under Michigan's No-Fault Act. It is not a bankruptcy firm and does not do any practice in this Court or any United States Bankruptcy Court.

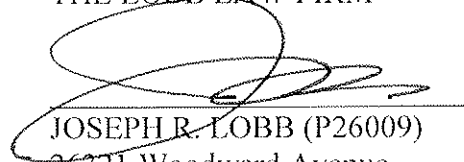
9. The Lobb Law Firm does not have a registered "filer" authorized to file papers in this Court in accordance with ECF procedures.

10. The Lobb Law Firm's only involvement in this matter is simply to preserve the interests of the aforementioned clients who either have personal injury judgments against Debtor or pending claims. The firm is only seeking to file papers for the limited basis of responding to Debtor's Objections to the claims of a number of its clients.

WHEREFORE, The Lobb Law Firm respectfully requests that this Honorable Court permit the filing of traditional paper documents in response to Debtor's Fifth and Sixth Omnibus Objections to Certain Claims.

Respectfully submitted,

THE LOBB LAW FIRM



JOSEPH R. LOBB (P26009)
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Dated: September 26, 2014

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

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Certificate of Service

I hereby certify that on September 26, 2014, I served the following paper:

Ex-Parte Motion to Permit Traditional Paper Filings

on the following parties at these addresses:

Clerk of the United States Bankruptcy Court
211 W. Fort St., Suite 1800, Detroit, Michigan 48226
Clerk of the Hon. Steven Rhodes
211 W. Fort St., Suite 1800, Detroit, Michigan 48226
John A. Simon, Esq., Tamar N. Colcourt, Foley & Lardner, LLP
500 Woodward Ave., Ste. 2700, Detroit, MI 48226

By the following means:

First Class U.S. Mail.

FILED
2014 SEP 29 P 4:00
U.S. BANKRUPTCY COURT
E.D. MICHIGAN DE LOUIT

THE LOBB LAW FIRM

Amy Demers
Amy Demers, Legal Assistant to
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Dated: September 26, 2014